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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re:	:
	:
HOTI ENTERPRISES, LP and	:
HOTI REALTY MANAGEMENT CO., INC.,	:
	:
Debtors.	:
-----X	

Chapter 11  
Lead Case No. 10-24129 (RDD)

**GECMC 2007 C-1 BURNETT STREET, LLC'S DESIGNATION OF  
ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

GECMC 2007 C-1 Burnett Street, LLC (the "Appellee") hereby designates, pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, the following additional items (including any and all exhibits attached thereto and filed therewith) to be included in the record in connection with the appeal of Hoti Enterprises, L.P. and Hoti Realty Management Co., Inc. (collectively, the "Appellants") [Dkt. No. 287] from the (a) Findings of Fact, Conclusions of Law, and Order Confirming the Third Modified Chapter 11 Plan of Reorganization for Hoti Enterprises LP and Hoti Realty Management Co., Inc., entered on June 19, 2012 [Dkt. No. 243], and (b) Order Denying Motion for Reconsideration of Order Confirming Plan of Reorganization, or in the Alternative, for a Stay Pending Appeal, entered on July 16, 2012 [Dkt. No. 276]:<sup>1</sup>

1. Amended Exhibit H to Motion of GECMC 2007 C-1 Burnett Street, LLC, for an Order Excusing Compliance with Section 543 of the Bankruptcy Code or,

<sup>1</sup> Unless otherwise indicated, all references herein to "Dkt. No." are to the docket maintained for Case No. 10-24129 (RDD).

Alternatively, Converting this Case to a Case Under Chapter 7, filed on November 4, 2010 [Dkt. No. 19].

2. Application to Employ and Retain Rattet, Pasternak & Gordon-Oliver, LLP as Attorneys for Debtors *Nunc Pro Tunc* as of the Filing Date, filed on November 5, 2010 [Dkt. No. 20].
3. Order Authorizing and Approving Retention of Rattet, Pasternak & Gordon-Oliver, LLP as Attorneys for Debtors and Debtors-In-Possession *Nunc Pro Tunc* as of the Filing Date, entered on January 3, 2011 [Dkt. No. 46].
4. Application to Employ Tanya P. Dwyer, Esq. as Attorney for Debtors, filed on February 12, 2011 [Dkt. No. 63].
5. Transcript of Hearing Held on February 9, 2011 [Dkt. No. 68].
6. Motion of GECCMC 2007 C-1 Burnett Street, LLC for an Order (A) Finding the Debtors and Victor Dedvukaj in Contempt of Court, (B) Compelling Compliance with the Cash Collateral Order, and (C) Imposing Sanctions, filed on March 24, 2011 [Dkt. No. 73].
7. Order Granting Motion (A) Finding Hoti Enterprises, LP, Hoti Realty Management Co., Inc. and Victor Dedvukaj in Contempt of Court, (B) Compelling Compliance with the Cash Collateral Order, and (C) Imposing Sanctions, entered on April 14, 2011 [Dkt. No. 84].
8. Transcript of Hearing Held on April 11, 2011 [Dkt. No. 90].
9. Motion of Victor Dedvukaj to Remove Sanctions Against Debtor (A) Objection of GECCMC 2007 C-1 Burnett Street, LLC as a Creditor, (B) Objection to Finding Victor Dedvukaj in Contempt of Court (C) Imposing Sanctions Against DLA Piper LLP (D) Objecting to Removing Tanya Dwyer as My Lawyer, filed on October 11, 2011 [Dkt. No. 105].
10. Objection Of GECCMC 2007 C-1 Burnett Street, LLC To Motion of Victor Dedvukaj, filed on October 24, 2011 [Dkt. No. 107].
11. Notice of Filing of Exhibit G To Objection Of GECCMC 2007 C-1 Burnett Street, LLC To Motion Of Victor Dedvukaj, filed on October 28, 2011 [Dkt. No. 109].
12. Order Denying in Part, Granting in Part, Motion to Remove Sanctions, entered on November 8, 2011 [Dkt. No. 110].
13. Order Granting Application to Employ Pick & Zabicki, LLP as Substitute Bankruptcy Counsel, entered on February 14, 2012 [Dkt. No. 124].

14. Debtors' Application for Authority to Retain Carl E. Person, Esq. as Special Litigation Counsel to the Debtor, *Nunc Pro Tunc*, filed on March 20, 2012 [Dkt. No. 133].
15. Emergency Motion for an Order Granting Pick & Zabicki LLP Leave to Withdraw as Counsel to the Debtors, filed on May 10, 2012 [Dkt. No. 200].
16. Objection of GECMC 2007 C-1 Burnett Street, LLC to Debtors' Application for Authority to Retain Carl Person, Esq. as Special Litigation Counsel to the Debtors, *Nunc Pro Tunc*, filed on May 10, 2012 [Dkt. No. 201].
17. Notice of Hearing on Application for Authority to Retain Carl E. Person, Esq. as Special Litigation Counsel to the Debtor, filed on May 11, 2012 [Dkt. No. 202].
18. Motion of GECMC 2007 C-1 Burnett Street, LLC for Entry of an Order Fixing and Establishing Cure Amounts in Connection with the Assumption and Assignment of Unexpired Leases, filed on May 30, 2012 [Dkt. No. 219].
19. Response to the Objections of GECMC to Application for Retention of Carl Person as Special Litigation Counsel to the Debtors, filed on June 8, 2012 [Dkt. No. 224].
20. Supplemental Response by Carl E. Person to GECMC's Objections to Carl Person's Application for Retention as Special Litigation Counsel to the Debtors, filed on June 14, 2012 [Dkt. No. 233].
21. Order Granting Motion of Pick & Zabicki, LLP to Withdraw as Attorney of Record to the Debtors, entered on June 18, 2012 [Dkt. No. 236].
22. Order Granting Motion Fixing and Establishing Cure Amount in Connection with the Assumption and Assignment of Unexpired Leases, entered on June 19, 2012 [Dkt. No. 241].
23. Order Authorizing Retention of Carl E. Person, Esq. as Special Litigation Counsel for the Debtors, entered on June 27, 2012 [Dkt. No. 250].
24. Notice of Assumption and Assignment of Unexpired Leases, filed on June 29, 2012 [Dkt. No. 252].
25. Notice of Presentment of Stipulation and Order With Respect to the Transfer of Funds Held by the Receiver in Accordance With the Chapter 11 Plan and the Confirmation Order, filed on July 6, 2012 [Dkt. No. 267].
26. Stipulation and Order With Respect to the Transfer of Funds Held by Receiver in Accordance With the Chapter 11 Plan and Confirmation Order, entered on July 12, 2012 [Dkt. No. 275].

27. Declaration of Victor Dedvukaj (A) in Opposition to GECMC 2007 C-1 Burnett Street, LLC in Seeking Entry for an Order to (1) Sustaining its Objections (2) Denying the Motion of Victor Dedvukaj to Remove Sanctions Against Debtor (I) Objection of GECMC 2007 C-1 Burnett Street, LLC as a Creditor (II) Objection to Finding Victor Dedvukaj in Contempt of Court (III) Imposing Sanctions Against DLA Piper LLP (IV) Objection to Removing Tanya Dwyer as my Lawyer (3) Granting Such Other and Further Relief as Just and Proper (B) Application in Support of an Order Granting Commencement of an Adversary Proceeding in Accordance with Bankruptcy Rule 7001(2) Objecting to GECMC 2007 C-1 Burnett Street, LLC Secured Claims and to Provide Adequate Protection Therefor, dated October 31, 2011 but not docketed until on or about April 12, 2012 [Dkt. No. 31 in Case No. 10-24130].
28. Proof of Claim filed by GECMC 2007 C-1 Burnett Street, LLC, Claim No. 8-1 on the Claims Register Maintained in Case No. 10-24129.
29. Proof of Claim filed by GECMC 2007 C-1 Burnett Street, LLC, Claim No. 9-1 on the Claims Register Maintained in Case No. 10-24129.

Appellee expressly reserves its right to amend and/or supplement this designation and to object, or otherwise supplement or move to strike or modify, some or all of the statement of issues and items designated by the Appellants to be included in the record on appeal.

Dated: August 27, 2012  
New York, New York

**DLA PIPER LLP (US)**

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